

SEP 06 2016

EPA-REGION 10

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September 2, 2016

Attn: Harbor Comments  
U.S. EPA  
805 SW Broadway St., Suite 500  
Portland, OR 97205

To Whom it May Concern:

I am greatly troubled by the recommended approach to cleaning up the Portland Harbor. There is significant community support to take action, rather than being passive, with respect to cleaning up the pollution that plagues the area. As an attorney with a background in environmental law, and a member of the community that regularly uses the Willamette for recreational purposes, I am writing this letter to urge the EPA to select Alternative G with additional dredging in areas of high human use, areas of high ecological value, and areas where there is high risk of re-contamination of the river. Therefore, I would like the following comments noted for the record:

- A. Under NO circumstances should the EPA should allow a confined disposal facility. This would create a permanent toxic waste dump in our river.
- B. The EPA should set much clearer timelines and metrics for success than those in the proposed plan. These should include setting an explicit date by which Portland Harbor specific fish consumption advisories will be lifted.
- C. The EPA's cleanup plan should include the heavily contaminated uplands as well as the heavily contaminated river.
- D. The EPA needs to do a much better job of addressing environmental justice issues, including reviewing and correcting significant deficiencies in its public engagement strategies for future phases of the Superfund process and delineating strategies for ensuring the jobs, economic benefits and other benefits associated with

the Superfund process to the local community and particularly to underserved communities that have been impacted by contamination in Portland Harbor. I find this to be increasingly important in light of the City of Portland's proposal to create homeless shelters on industrial lands adjacent to the river.

Thank you for your consideration.

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